

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CHARLES LANGONE, as FUND MANAGER  
of the NEW ENGLAND TEAMSTERS AND  
TRUCKING INDUSTRY PENSION FUND

Plaintiff,

v.

STAMPRETE OF RHODE ISLAND, STAMP  
CRETE OF RHODE ISLAND, INC.  
AND STAMPED CONCRETE, INC.

Defendants,

C.A. No. 04cv11125 NG

**PLAINTIFF'S MOTION TO COMPEL RESPONSES TO INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS PURSUANT TO F.R.C.P. 37(a)**

Pursuant to Federal Rule of Civil Procedure 37(a), the Plaintiff respectfully moves that this Court order the defendants to respond to the First and Second Sets of Interrogatories and First and Requests for Production of Documents Propounded by the Plaintiff. Attorney for Plaintiff certifies that she has in good faith conferred with Defendant in an attempt to secure disclosure without court action.

Date: July 22, 2005

Respectfully submitted,

For the Plaintiff,  
CHARLES LANGONE, FUND MANAGER  
By his Attorney,

/s/ Catherine M. Campbell  
Catherine M. Campbell, BBO #549397  
Feinberg, Campbell & Zack, P.C.  
177 Milk Street  
Boston, MA 02109  
(617) 338-1976

Certificate of Service

I, Catherine M. Campbell, do hereby certify that on this date, I served the foregoing by first-class mail upon Bruce E. Thompson, Esq., Casey & Thompson, P.C., 8 North Main Street, Attleboro, MA 02703.

/S/ Catherine M. Campbell  
Catherine M. Campbell

Date: July 22, 2005